

3:21-mj-00093

ATTACHMENT A
Description of Charges

Count 1
(Sexual Exploitation of Children)
(18 U.S.C. §§ 2251(a) and (2))

Between on or about March 22, 2019, and about December 12, 2019, in the District of Oregon and elsewhere, defendant **JORGE ROSALES** knowingly used, persuaded, induced, enticed, and coerced Minor Victim 1, a person under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct or transmitting a live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, and such visual depiction having actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

Count 2
(Distribution of Child Pornography)
(18 U.S.C. § 2252A(a)(2))

Between on or about September 1, 2020, and about November 26, 2020, in the District of Oregon, defendant **JORGE ROSALES** knowingly and unlawfully distributed child pornography using any means or facility of interstate or foreign commerce.

In violation of Title 18, United States Code, Section 2252A(a)(2).

Count 3
(Possession of Child Pornography)
(18 U.S.C. § 2252A(a)(5)(B))

On or about August 13, 2020, in Washington County, in the District of Oregon, defendant **JORGE ROSALES** knowingly and unlawfully possessed material containing child pornography that had been shipped or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

Count 4
(Cyberstalking)
(18 U.S.C. § 2261A(2)(B))

Beginning on or about March 11, 2018, and continuing to on or about June 16, 2020, in the District of Oregon and elsewhere, defendant **JORGE ROSALES**, with the intent to harass and intimidate, used an interactive computer service, electronic communication service, or other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, or would reasonably be expected to cause substantial emotional distress to Minor Victim 1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

Count 5
(Online Enticement of a Minor)
(18 U.S.C. § 2422(b))

Beginning on or about March 11, 2018, and continuing to on or about June 16, 2020, in the District of Oregon and elsewhere, defendant **JORGE ROSALES**, using a facility or means of interstate or foreign commerce, namely the internet, knowingly persuaded, induced, enticed, and coerced Minor Victim 1, a person who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).